

BRESSLER, AMERY & ROSS, P.C.

John D. Miller, III
Justin E. Condit
325 Columbia Turnpike
Florham Park, NJ 07932
(973) 514-1200
(973) 514-1660 (facsimile)
Attorneys for Plaintiff Sandhills Global, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SANDHILLS GLOBAL, INC.,

Plaintiff,

v.

LAWRENCE GARAFOLA, individual,
and FACTS TECHNOLOGY LLC, a New
Jersey limited liability company,

Defendants.

Civil Action No. 3:19-cv-20669

**NOTICE OF MOTION FOR
ATTORNEYS' FEES**

Return date: November 2, 2020

PLEASE TAKE NOTICE that on November 2, 2020 at 9:00am or as soon thereafter as counsel may be heard, the undersigned counsel for Plaintiff Sandhills Global, Inc. ("Sandhills") shall make a motion before the Honorable Michael A. Shipp, United States District Judge, at the United States District Court for the District Court of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order awarding counsel fees and costs to Sandhills Global Inc., in the above captioned action.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff will rely upon the accompanying Declaration of John D. Miller, III with exhibits and the Brief in Support of the Motion for Attorneys' Fees and Cost.

PLEASE TAKE FURTHER NOTICE Plaintiff requests oral argument should this motion be opposed.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is supplied with this motion.

Dated: October 9, 2020

Respectfully submitted,

By: /s/ John D. Miller, III

BRESSLER, AMERY & ROSS, P.C.

John D. Miller, III

Justin E. Condit

325 Columbia Turnpike

Florham Park, NJ 07932

(973) 514-1200